

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,

Plaintiff

v.

TIMOTHY CALLAHAN,
FRANCIS M. ROACHE,
PAUL MURPHY, RICHARD WALSH,
and THE CITY OF BOSTON,

Defendant

C.A. NO.: 04-11193NG

MOTION FOR ORDER COMPELLING DISCLOSURE OF
CRIMINAL OFFENDER RECORD INFORMATION

Pursuant to the Order of the Court, the Defendants hereby move for an Order compelling the disclosure of Plaintiff trial witness, Shawn Drumgold. As grounds therefore, Defendants submit that the foregoing individuals appear on the Plaintiff's list of trial witnesses, and Defendants respectfully request that the CORI order be allowed so as to provide adequate opportunity to access certified copies of arrest, criminal charge and conviction, if any, of the aforementioned witness.

Respectfully submitted,
By the Defendant Timothy Callahan
Through his attorney,

/s/ Mary Jo Harris

Mary Jo Harris
Morgan, Brown & Joy, LLP
200 State Street
Boston, Massachusetts 02109
Tel.: (617) 523-6666
BBO# 561484

Respectfully submitted,
By Defendant Richard Walsh
Through his attorney,

/s/ Hugh R. Curran

Hugh R. Curran
Bletzer & Bletzer
300 Market Street
Brighton, Massachusetts 02135
Tel.: (617) 254-8900
BBO# 402057

Date: March 2, 2008

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Defendant

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ORDER FOR CRIMINAL AND PROBATION RECORDS

Upon leave of Court, access is granted to counsel for the Defendants, Mary Jo Harris, Morgan, Brown & Joy, LLP, 200 State Street Boston, MA 02109 (for Defendant Callahan); Hugh R. Curran, Bletzer & Bletzer, 300 Market Street, Brighton, MA 02135 (for Defendant Walsh); John Roache, Roache & Malone, 66 Long Wharf Boston, MA 02110 (for Defendant City of Boston); and William M. White, Wm. White & Associates, One Faneuil Hall Marketplace, Boston, MA 02109 (for Defendant Callahan), to obtain certified copies of all criminal records, and all documents related thereto, of the individual identified on Exhibit A (attached).

By the Court,

Dated: _____, 2008

**EXHIBIT A TO DEFENDANTS' MOTION FOR
DISCLOSURE OF CRIMINAL OFFENDER RECORD INFORMATION**

1. Shawn Drumgold
Social Security No. [REDACTED]
Date of Birth: [REDACTED]